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VIA ECF

The Honorable Michael A. Shipp
United States District Court for the District of New Jersey
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

Re: *In re Valeant Pharms. Int'l, Inc. Sec. Litig.*, Master No. 15-cv-7658-MAS-RLS

Dear Judge Shipp:

We write on behalf of Defendants in response to Your Honor's remarks at the August 29, 2024 pretrial conference inviting the parties to submit potential additional questions for the Court's juror questionnaire. While Defendants have no objections to the Court's questionnaire, to the extent Your Honor is willing to consider additional questions, Defendants respectfully suggest the following questions for the jury panel:

21. Do you have any other views or experiences with pharmaceutical companies that may affect your ability to be fair and impartial in a case involving a pharmaceutical company?¹
22. Have you heard or read anything about this lawsuit, about Valeant Pharmaceuticals, or about Valeant Pharmaceutical's executives before today that may affect your ability to be fair and impartial as a juror?

Respectfully submitted,

/s/ Matthew A. Sklar

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¹ The numbering reflects the proposed placement of the supplemental questions in the Court's August 27, 2024 juror questionnaire.